

THURSTON COUNTY DEPARTMENT OF COMMUNICATIONS "CAPCOM"



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September 6, 2005

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: WT Docket 05-196

I am writing on behalf of the Thurston County Department of Communications, in Olympia Washington. We are a Countywide PSAP and Public Safety Dispatch Center for all law enforcement, fire and emergency medical agencies that total twenty six, within our County. Our service area includes 758 square miles and we service a population of 258,000. Our area includes the State Capitol City of Olympia, and a deep water shipping port that is located in the Puget Sound.

I am the Director of Communications for Thurston County, and our organization supports the FCC's ruling to regulate VOIP, and require interconnected VOIP providers ensure they are able to deliver accurate location and call back information to the PSAP when their customer calls 9-1-1.

9-1-1 was created for the public's safety, and automatic location identification (ALI) is an important part of its enhanced features that the public has come to expect as basic service. If 9-1-1 processing isn't viewed as "fast enough", or losses occur, law suits are filed at the drop of a hat. The processing of 9-1-1 calls needs to take place as fast as possible, while ensuring accuracy in doing so. When processing time increases, as it has with VOIP calls, it means that other emergent calls to our PSAPs must wait. Unnecessary delays must be prevented. This comes from good rulings, like what the FCC has issued in regards to VOIP and 9-1-1. Processing VOIP calls is already taking additional valuable time that could mean the difference between life or death, or saving or losing property for the next emergency caller. Had development of this product addressed the impact to our 9-1-1 systems prior to marketing, it would have addressed the public's safety. Because that didn't happen, our PSAPs are shouldering an undue burden by taking calls from VOIP subscribers, that don't get routed to the closest PSAP, don't have location

information and take at least 1/3 longer to process than an equivalent wireline call. In addition, without the revenue to support the additional Call Receivers to handle the increased workload the impact is negatively affecting our PSAPs across the nation.

While I believe the Commission has acted responsibly in requiring VOIP providers interconnect and provide enhanced 9-1-1 features to their customers, I think reason should prevail in considering any extension to the 120 day deadline. I define a reasonable extension to be 90 days or less, recognizing the task the VOIP providers were asked to accomplish. I ask that the Commission ensure that any requirements imposed on VoIP providers do not cause an undue burden on our PSAP's ability to process and dispatch an emergency response to a 9-1-1 call. And I ask that the Commission ensure that its rules take in to consideration the operational requirements of the current PSAP infrastructure and not impose rules that will require considerable upgrades or replacement of PSAP equipment.

Sincerely,

James C. Quackenbush, Director